

STEVE HARVEY LAW LLC

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Attorneys for Plaintiff

Zachary Funt

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|-----------------------|---|---------------------------------------|
| ZACHARY FUNT, | : | |
| | : | |
| Plaintiff, | : | |
| | : | |
| v. | : | Civil Action No. 2:20-cv-03188 |
| | : | |
| ANGELIQUA KUO, | : | |
| | : | |
| Defendant. | : | |
| | : | |
| | : | |

**DECLARATION OF BARBARA B. HILL IN SUPPORT OF PLAINTIFF ZACHARY
FUNT'S REQUEST FOR ENTRY OF DEFAULT AGAINST ANGELIQUA KUO**

I, Barbara B. Hill, Esq., hereby declare as follows:

1. I am an attorney at the law firm of Steve Harvey Law LLC in Philadelphia, Pennsylvania, and an attorney-of-law in good standing of the Bar of the Commonwealth of Pennsylvania.
2. Steve Harvey Law LLC represents Plaintiff Zachary Funt ("Funt") in the above-captioned matter.

3. I make this declaration in support of Funt's Request for Entry of Default against Angeliqua Kuo ("Kuo").

4. On June 29, 2020, Funt filed his Complaint in this matter. ECF No. 1.

5. Kuo was personally served with a copy of Funt's Complaint on July 3, 2020. ECF No. 2 at 2.

6. More than 21 days have elapsed since Kuo was served with the Complaint. Kuo has failed to plead or otherwise defend as required by the Federal Rules of Civil Procedure.

7. Accordingly, Funt requests that the Clerk of Court enter a default against Defendant Angeliqua Kuo.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



Dated: Philadelphia, Pennsylvania
August 12, 2020

Barbara B. Hill